

) The Hon. Anna M. Manasco presiding

1. On September 1, 2023, the Court entered the initial Scheduling Order in this matter, Doc. 33.
2. Upon the Joint Revised Motion of the parties to Amend the Scheduling Order, Doc. 38, filed on September 1, 2023, this Court entered by Text Order (Doc. 39) a Revised Scheduling Order changing certain deadlines and time limits, including a ready for trial date to November 2024.

3. Since September 1, 2023, the parties have successfully exchanged paper discovery, exchanged initial expert disclosures, and taken eight depositions.
4. The parties have scheduled a second mediation with Tim Donohue for June 6, 2024.
5. The parties had scheduled the deposition of the Plaintiff's expert for May 23, 2024, and Defendant's expert for May 30, 2024.
6. On May 17, 2024, Plaintiff filed a Supplemental Rule 26 Expert Disclosure (Doc. 45 and 45.1).
7. On May 20, 2024, Defendants filed a Motion to Strike Plaintiff's Supplemental Rule 26 Expert Disclosure (Doc. 46).
8. The Parties are requesting an extension of deadlines and time limits so as to resolve Defendants' recently filed Motion to Strike (Doc 46) and to reset the expert depositions to a date beyond the scheduled mediation.
9. The Parties request scheduling order date extensions as follows:
  - a. Discovery due by July 12, 2024.
  - b. Dispositive Motions due by August 16, 2024.
  - c. Joint Status Report due by August 5, 2024.
  - d. Status Conference to be set August 23, 2024.
  - e. Ready for trial to remain as November 2024.

Wherefore, premises considered, the parties respectfully ask this Honorable Court to enter an amended scheduling order as requested in paragraph 9 above.

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